



ROPES & GRAY LLP
1211 AVENUE OF THE AMERICAS
NEW YORK, NY 10036-8704
WWW.ROPESGRAY.COM

October 24, 2014

Michael G. McGovern
T +1 212 841 8860
F +1 646 728 1675
michael.mcGovern@ropesgray.com

VIA FACSIMILE AND ECF

Honorable Kimba M. Wood
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Zevi Wolmark*, 09 Cr. 1058 (KMW)

Dear Judge Wood:

We respectfully submit this letter on behalf of our client, Zevi Wolmark, to request that the Court grant Mr. Wolmark permission to travel to New York, New Jersey and Israel, and within the state of California, with prior notification to the U.S. Department of Probation and, specifically, Ms. Jennifer Soliz, his probation officer, including a detailed itinerary with dates of departure and return, and any flight information, if applicable. Mr. Wolmark will provide Ms. Soliz with at least two weeks' notice regarding his international travel and notice within a reasonable time frame for his domestic travel. We have conferred with both the Government and Ms. Soliz, and neither party objects to this request.

As your Honor is aware, on January 9, 2012, Mr. Wolmark pleaded guilty pursuant to a cooperation agreement with the Government. As the Government's 5K letter to Judge Baer later attested, Mr. Wolmark provided "particularly helpful" assistance to the Government during the pre-trial and trial phases of *United States v. Carollo, et al.*, 10 Cr. 654, wherein he provided invaluable information regarding the charges in that case and served as a key government witness at trial. See 5K letter from Steven Tugander to the Honorable Harold Baer, April 5, 2013, at 5-6.

Mr. Wolmark currently is assigned by the Bureau of Prisons to home confinement in California. On October 30, 2014, Mr. Wolmark will be placed on supervised release under the supervision of U.S. Probation Officer Soliz. As a standard condition of his supervised release, Mr. Wolmark "shall not leave the judicial district without the permission of the court or probation officer." See Dkt. 413, Judgment, April 11, 2013. Mr. Wolmark, however, poses no risk of flight,

ROPES & GRAY LLP

- 2 -

October 24, 2014

as exhibited by his exemplary cooperation and compliance with his sentence.¹ Furthermore, Mr. Wolmark's personal and professional circumstances, including numerous out-of-state investments, elderly parents who reside in New York State, and extended family living abroad, may require domestic and international travel.

Accordingly, Mr. Wolmark respectfully requests that the Court amend his conditions of release to allow him the limited travel to New York, New Jersey and Israel, and within the state of California, with prior notification to Ms. Soliz, as indicated above.

Respectfully submitted,



Michael G. McGovern

cc: Steven Tugander, Esq., U.S. Department of Justice
Jennifer Soliz, U.S. Department of Probation

¹ Prior to sentencing, Mr. Wolmark also exhibited his full cooperation and zero risk of flight by voluntarily surrendering to the Government his United States and Israeli passports. The Government has since returned those passports to Mr. Wolmark.